

# **EXHIBIT A**

EEOC FORM 131 (5-01)

## U. S. Equal Employment Opportunity Commission

Ms. Claudia Cobble  
Human Resources Manager  
NORAMCO OF DELAWARE, INC.  
500 Swedes Landing Road  
Wilmington, DE 19801

## PERSON FILING CHARGE

Zahra M. Mowafy

THIS PERSON (check one or both)

☒ Claims To Be Aggrieved☐ Is Filing on Behalf of Other(s)

EEOC CHARGE NO.

170-2004-00315

## NOTICE OF CHARGE OF DISCRIMINATION

(See the enclosed for additional information)

This is notice that a charge of employment discrimination has been filed against your organization under:

☒ Title VII of the Civil Rights Act☐ The Americans with Disabilities Act☒ The Age Discrimination in Employment Act☐ The Equal Pay Act

The boxes checked below apply to our handling of this charge:

1. ☐ No action is required by you at this time.2. ☐ Please call the EEOC Representative listed below concerning the further handling of this charge.3. ☒ Please provide by **16-APR-04** a statement of your position on the issues covered by this charge, with copies of any supporting documentation to the EEOC Representative listed below. Your response will be placed in the file and considered as we investigate the charge. A prompt response to this request will make it easier to conclude our investigation.4. ☒ Please respond fully by **16-APR-04** to the enclosed request for information and send your response to the EEOC Representative listed below. Your response will be placed in the file and considered as we investigate the charge. A prompt response to this request will make it easier to conclude our investigation.5. ☒ EEOC has a Mediation program that gives parties an opportunity to resolve the issues of a charge without extensive investigation or expenditure of resources. If you would like to participate, please say so on the enclosed form and respond by **29-MAR-04** to **Phil A. Goldman, ADR Coordinator, at (215) 440-2819**. If you DO NOT wish to try Mediation, you must respond to any request(s) made above by the date(s) specified there.

For further inquiry on this matter, please use the charge number shown above. Your position statement, your response to our request for information, or any inquiry you may have should be directed to:

Alfred L. Harris  
Enforcement Manager

EEOC Representative

Telephone: **(215) 440-2811**

Philadelphia District Office  
21 South 5th Street  
Suite 400  
Philadelphia, PA 19106

Enclosure(s): ☒ Copy of Charge

## CIRCUMSTANCES OF ALLEGED DISCRIMINATION

☒ RACE☐ COLOR☐ SEX☒ RELIGION☒ NATIONAL ORIGIN☒ AGE☐ DISABILITY☐ RETALIATION☐ OTHER

See enclosed copy of charge of discrimination.

Date

March 17, 2004

Name / Title of Authorized Official

Marie M. Tomasso  
Director

Signature

*Marie M. Tomasso*

# **EXHIBIT B**

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

**ZAHRA MOWAFY,**

**Plaintiff,**

**v.**

**NORAMCO OF DELAWARE, INC.  
and NORAMCO, INC.,**

**Defendants.**

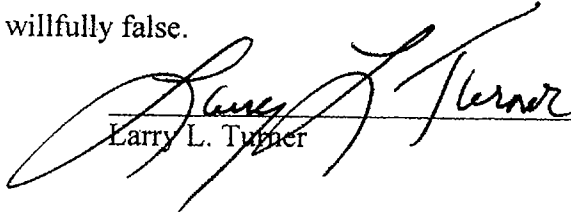
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**AFFIDAVIT OF LARRY L. TURNER**

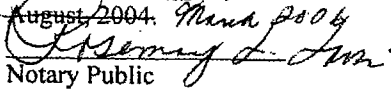
I, Larry L. Turner, being first duly sworn under oath, state and depose as follows:

1. I am a partner with the law firm Morgan Lewis & Bockius.
2. I have represented the Defendants in their dispute with Plaintiff since May 2004.
3. I am familiar with the litigation history of this matter.
4. My office received a copy of the Plaintiff's Default Motion by regular mail on Friday, March 17, 2006.
5. As of the filing of this response to the Plaintiff's Default Motion, I am not aware of my office or Noramco being served with a copy of the Plaintiff's Amended Complaint.

6. I understand that I am subject to punishment by law under 18 Pa. C.S. § 4904 if the foregoing statements are willfully false.

  
Larry L. Turner

Sworn to and subscribed  
before me this 1<sup>st</sup> day of

~~August, 2004.~~ March 2006  
  
Notary Public

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Rosemary L. Lavin, Notary Public  
City Of Philadelphia, Philadelphia County  
My Commission Expires Aug. 23, 2008  
Member, Pennsylvania Association Of Notaries